

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

DEMOCRATIC NATIONAL COMMITTEE, *et al.*

Plaintiffs,

v.

REPUBLICAN NATIONAL COMMITTEE, *et al.*

Defendants.

Civil Action No.: 81-3876

Judge John Michael Vazquez

**DECLARATION OF CHRISTOPHER M. MARSTON**

Pursuant to 28 U.S.C. § 1746, I, Christopher M. Marston, declare as follows:

1. I am over the age of 18, have personal knowledge of the facts stated in this Declaration, and can competently testify to their truth.

2. I am the General Counsel for the Republican Party of Virginia, and have served in this position for the party since March 14, 2015. I am also a member of the Bar of the Commonwealth of Virginia.

3. As General Counsel for the Republican Party of Virginia, I provide compliance advice for staff and volunteers on activities supporting the election of Republican candidates.

4. I reviewed the Declaration of Frank Anderson and the materials appended to his Declaration, which were filed only last night in the above captioned case (Dkt. #125). I also listened to the audio recording provided as part of that filing.

5. On November 1, 2016, I did indeed provide an online training program for volunteers assisting the Republican Party of Virginia. As shown on the poll watching guidance attached to Mr. Anderson's Declaration, the documents for the program were prepared by the Fairfax Country Republican Committee. There was no support or involvement of the RNC in this program.

6. While describing voting technology to the listeners, I mentioned that the RNC had hired a consultant knowledgeable on that topic. I am aware of the RNC's Consent Decree, and have heard many times from RNC personnel that it restricts the RNC's involvement in election day activities. Knowing how seriously the RNC takes the Consent Decree, I immediately emphasized (with some laughter) that the RNC was *not* involved in election day operations so that listeners would not misunderstand this.

7. I am surprised that the DNC would rely on this statement to claim that the RNC is involved in election day operations. I also find it outrageous that the DNC apparently condones Frank Anderson's misleading participation in this online program. As he explains in his Declaration, Mr. Anderson accessed the online program under false pretenses – he admits having his intern register under his name – and then recorded the call without permission or notice.

I declare under penalty of perjury that the foregoing is true.

Executed on November 4, 2016.



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Christopher M. Marston